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*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER PORTIONS OF  
30(B)(6) DEPOSITION JOINT LETTER  
BRIEF SHOULD BE SEALED (DKT. 410)**

Referral: Hon. Susan van Keulen, USMJ

I, Jonathan Tse, declare as follows:

1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 410.

3. On February 17, 2022, Plaintiffs filed its Administrative Motion to Consider Whether Portions of 30(b)(6) Deposition Joint Letter Brief Should be Sealed (Dkt. 410). On February 17, 2022, I received an unredacted service copy of these documents. .

4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5, unredacted versions of which have been filed at Docket Entry 410. Based on my review, there is good cause to seal the following information:

Document	Basis for Sealing
30(b)(6) Joint Letter Brief  Pages 1:14-15, 1:16, 1:18, 1:21, 1:24, 1:27, 2:1, 2:8-12, 2:17, 2:19, 2:25, 3:4-5, 4:1-2, 4:8, 4:9, 4:13-14, 4:16, 4:24-27, 5:1, 5:6-7, 5:15-16	The information requested to be sealed contains Google’s highly confidential and proprietary information, regarding highly sensitive features of Google’s internal systems and operations, including details related to internal projects, identifiers, cookies, and their proprietary functionalities, as well as internal investigations of features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
Exhibit A to 30(b)(6) Joint Letter Brief	The information requested to be sealed contains Google’s highly confidential and proprietary information, regarding highly sensitive features of Google’s internal systems and

Pages 1:4, 1:8, 2:7, 3:15, 6:8-10, 6:13, 7:4, 7:7, 7:10, 7:12, 8:8, 15:5, 15:8, 15:10, 16:15, 17:4, 17:6, 21:11, 21:14-15, 22:3, 22:5, 22:7-9, 22:12, 23:3, 23:6, 23:13, 24:5, 25:10, 25:13, 25:15, 26:9-10, 27:10-11, 27:13, 27:15, 31:14, 32:6, 32:13

operations, including details related to internal projects, identifiers, and cookies, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

Google's request is narrowly tailored in order to protect its confidential information. These redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored and limited to portions containing Google's highly-confidential or confidential information, Google requests that the portions of the aforementioned documents be redacted from any public version of those documents.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on February 23, 2022.

DATED: February 23, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Jonathan Tse

Jonathan Tse

*Attorney for Defendant*